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December 12, 2000

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

RE: Docket No. 99F-1912

Dear FDA,

We strongly object to the Food and Drug Administration's decision to allow the use of ultraviolet radiation to "treat" fruit and vegetable juice. Irradiation has the potential to adversely affect the health of our family.

Specifically, We object because:

- (1) The company that applied for the irradiation permit admits that UV radiation destroys 48 percent of the beta carotene and 13 percent of the vitamin C in orange juice. The FDA ignored warnings from agency scientists who urged that more tests on nutrient destruction should be conducted and analyzed before the permit was approved.
- (2) The FDA did not determine a safe level of radiation to which juice can be exposed and still be safe for human consumption, as federal law requires.
- (3) The FDA conducted no independent analysis to determine the potential toxicity of the new chemicals formed in irradiated juice.
- (4) The company that applied for the irradiation permit offered to prevent the release of smog-forming ozone during the irradiation process. The FDA freed the company of this restriction, however, despite warnings from an FDA scientist that "ozone can have deleterious health effects on humans who may be exposed to it (e.g. via inhalation), and may have undesirable effects on organoleptic qualities of the juice."

As concerned United States citizens and taxpayers, we demand that you reevaluate this decision.

Sincerely,


Dr. Mha Atma S. Khalsa


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99F-1912

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